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and Daniel Gericke

**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**PORTLAND DIVISION**

LOUJAIN HATHLOUL ALHATHLOUL,

Plaintiff,

vs.

DARKMATTER GROUP, MARC BAIER,  
RYAN ADAMS, and DANIEL GERICKE,

Defendants.

Case No. 3:21-CV-01787-IM

SECOND DECLARATION OF RYAN  
ADAMS

**DECLARATION OF RYAN ADAMS**

I, Ryan Adams, declare:

1. I am a defendant in this action. I am over the age of 18. I make this declaration based on personal knowledge. If called upon to do so, I would testify truthfully as follows.

2. I am not domiciled in Oregon.

3. I have never resided in Oregon and do not consider it my home.

4. I do not own real property in Oregon and never have.

5. I do not have an Oregon driver's license and never have.

6. I am not an Oregon voter, nor have I ever been.

7. My only connection to Oregon is that my wife's family lives there.

8. I am not a resident of any state, territory, protectorate, or other United States jurisdiction. I am domiciled in the Middle East and have been for approximately 13 years.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on 7/10/2023.

DocuSigned by:

*Ryan Adams*

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Ryan Adams

4887-9913-3806